

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

UNITED STATES OF AMERICA  
Plaintiff

v

DOMINIQUE G. COLLIOT,  
Defendant

and

UBS FINANCIAL SERVICES INC.,  
Garnishee.

Court No. 1:16-cv-01281

**VERIFIED ANSWER OF  
UBS FINANCIAL SERVICES INC.**

UBS Financial Services Inc (“UBS”), Garnishee-Defendant, files this Verified Answer to the Writ of Garnishment received by UBS on or about February 22, 2017, and in answer shows the following:

**I.**

**Date of Service**

1. The Writ of Garnishment was served on UBS on or about February 22, 2017 (“date of service”).

## II. Indebtedness Derived from Trust Accounts

2. On the date of service and the date of this answer, UBS maintained or referenced the following assets in two brokerage accounts over which Defendant Dominique G. Colliot has control via a trading authorization, specifically account XXXX633, styled in the name "Dominique G Colliot TTEE U/A Dtd 03/25/1991 Dominique Colliot Trust," and account

XXXX632, styled in the name "Michele T Colliot TTEE U/A Dtd 03/25/1991 Michele T Colliot Living Trust" ("the Accounts"). With respect to the 632 account, Mr. Colliot has trading authorization but is not the Trustee. On February 22, 2017, account XXXX633 had a value of \$4,443,878.28 and account XXXX632 had a value of \$1,323,916.20. We have restricted the accounts against trading and withdrawals. **The Accounts are pledged as collateral on a UBS Bank USA Premier Variable Credit Line held and managed for Dominique G Colliot TTEE U/A Dtd 03/25/1991, Dominique Colliot Trust with an outstanding balance of \$1,175,462.89, with interest continuing to accrue at approximately \$90.66 per day.**

**III.  
Market Fluctuations**

3. The value of the Accounts described above may change due to market activity, over which UBS has no control.

**IV.  
No Personal Property**

4. On the date of service and the date of this answer, UBS was not in possession of any personal property belonging to Defendant, other than the Accounts described above.

**V.  
Knowledge of Other Debts Owed to Judgment-Defendant**

5. UBS is not aware of any other person owing any debts to Defendant, or possessing effects belonging to Defendant.

**PRAYER**

UBS Financial Services Inc., Garnishee, prays that:

a. It be discharged on the answer and that the garnishment be terminated in accordance with 28 U.S.C. § 3205 (c)(10).

b. For such other relief to which UBS may show itself to be justly and properly entitled.

Respectfully Submitted,

**BALLARD & LITTLEFIELD LLP**

By: /s/Donald R. Littlefield  
Donald R. Littlefield  
Texas Bar No. 12427350  
Kristina L. Cunningham  
Texas Bar No. 24049712  
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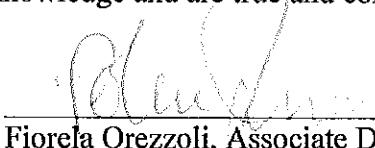
**ATTORNEYS FOR GARNISHEE  
UBS FINANCIAL SERVICES INC.**

**VERIFICATION**

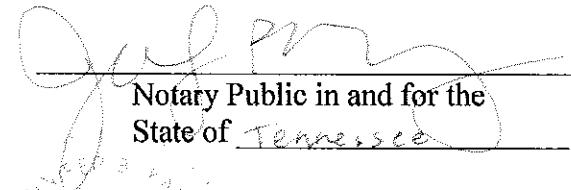
STATE OF TENNESSEE

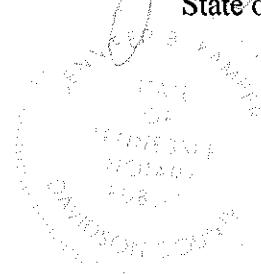
COUNTY OF Davidson

Before me, the undersigned authority, on this day personally appeared Fiorela Orezzoli, on behalf of UBS Financial Services Inc., signing as its Custodian of Records for UBS Financial Services Inc., a person whose identity is known to me. After I administered an oath to her, upon oath she said she read the Verified Original Answer of UBS Financial Services Inc., and that the facts stated in it are within his/her personal knowledge and are true and correct.

  
Fiorela Orezzoli, Associate Director

Sworn to and subscribed to before me by Fiorela Orezzoli on  
this 27<sup>th</sup> day of February, 2017.

  
Notary Public in and for the  
State of Tennessee

  
My commission expires 01/08/18

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served by methods indicated on February 28, 2017 to the following:

*Via First Class Mail*  
Herb Linder  
United States Department of Justice  
717 N. Harwood, Suite 400  
Dallas, TX 75201

*Via First Class Mail*  
Dominique Colliot  
8709 Mendocino Drive  
Austin, TX 78735

/s/Donald R. Littlefield  
Donald R. Littlefield